

Wendy M. Krincek, Esq.
Nevada Bar No. 6417
Diana G. Dickinson
Nevada Bar 13477
LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
Suite 300
Las Vegas, Nevada 89169.5937
Telephone: 702.862.8800
Fax No.: 702.862.8811
wkrincek@littler.com
ddickinson@littler.com

Attorneys for Defendant
ENCOMPASS HEALTH REHABILITATION
HOSPITAL OF LAS VEGAS, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PATRICIA JANCATERINO, an individual,

Plaintiff,

v.

ENCOMPASS HEALTH REHABILITATION
HOSPITAL OF LAS VEGAS, LLC, a Delaware
limited liability company,

Defendant.

Case No. 2:25-cv-00157-ART-DJA

**STIPULATION TO EXTEND TIME FOR
DEFENDANT TO FILE RESPONSIVE
PLEADING TO PLAINTIFF'S
COMPLAINT**

[FIRST REQUEST]

Plaintiff PATRICIA JANCATERINO ("Plaintiff") and Defendant ENCOMPASS HEALTH REHABILITATION HOSPITAL OF LAS VEGAS, LLC ("Defendant"), by and through their undersigned counsel, hereby agree and stipulate to extend the time for Defendant to file a response to the Complaint from the current deadline of March 14, 2025, up to and including **April 14, 2025**.

The requested extension is necessary in light of the fact that Defendant's counsel was recently retained. The additional time will allow defense counsel to conduct a complete investigation into the allegations and to prepare a response to the Complaint.

///

///

1 This is the first request for an extension of time to respond to the Complaint. This request is
2 made in good faith and not for the purpose of delay.

3
4 Dated: March 10, 2025

Dated: March 10, 2025

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Jemma E. Dunn

/s/ Diana G. Dickinson

8 Jemma E. Dunn, Esq.
9 Matthew T. Hale, Esq.
10 Michael A. Burnett, Esq.
11 GREENBERG GROSS LLP

Wendy M. Krincek, Esq.
Diana G. Dickinson, Esq.
LITTLER MENDELSON, P.C.

12 *Attorneys for Plaintiff*
13 PATRICIA JANCATERINO

Attorney for Defendant
ENCOMPASS HEALTH REHABILITATION
HOSPITAL OF LAS VEGAS, LLC

14
15 **IT IS SO ORDERED.**

16 Dated: 3/11/2025

17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES MAGISTRATE JUDGE

4916-8287-4912.1 / 060078.1184